

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PATRICIA A. LATHAM,
Plaintiff,

VS.

THE MINNESOTA LIFE INSURANCE
COMPANY,
Defendant.

AGREED MOTION TO CONTINUE SCHEDULING CONFERENCE

Plaintiff, Patricia A. Latham, and Defendant, Minnesota Life Insurance Co.,
through their respective counsel, Perry, Hicks, Crotty & Deshaies, and Cozen O'Connor,
hereby move this Court for a continuance of the Scheduling Conference. In support of
said motion, the parties state as follows:

1. This matter is set for a scheduling conference for March 30, 2005 at 2:30 p.m.
2. Plaintiff, due to an address error in the Court's files, did not receive a copy of the Notice of Scheduling Conference and first learned of it on March 24, 2005.
3. Both parties agree to a continuance of the March 30, 2005 Scheduling Conference to allow Plaintiff time to confer with his client regarding the matters to be discussed therein and to fully prepare the Joint Statement and settlement proposals.

WHEREFORE, Plaintiff and Defendant respectfully request this Court to continue the Scheduling Conference to a date convenient with the Court.

Respectfully submitted,

Plaintiff, Patricia A. Latham

By: Mark R. Deshaies / p. A. jms
One of her Attorneys

Minnesota Life Insurance Co.

By: John D. Shea
One of its Attorneys

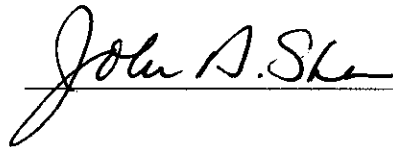
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CERTIFICATE OF SERVICE

The undersigned counsel certifies that a copy of the foregoing Motion to Continue Scheduling Order was served via regular mail, postage pre-paid, on the 24th day of March 2005 on the following counsel of record:

Marc R. Deshaies
BBO#550198
388 County Street
New Bedford, MA 02740
(508)996-8921

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